

F. Other NEPA Requirements

Section F includes discussions of various topics required by NEPA that are not necessarily discussed elsewhere in the EIS. These topics include Section F.1, indirect effects, including growth-inducing effects; Section F.2, irreversible and irretrievable commitment of resources, including energy use; Section F.3, unavoidable adverse impacts; and Section F.4, relationship between short-term uses and long-term productivity of the environment with regard to the project. Section F.5 describes energy requirements and conservation potential of various alternatives and mitigation measures.

Appendix 9 (Policy Screening Report) of this EIS addresses NEPA's requirement to discuss possible conflicts between proposed actions and the objectives of federal, state, local, or tribal land use plans, policies, and controls (40 CFR 1502.16[c]).

F.1 Indirect Effects Including Growth-Inducing Effects

NEPA requires a discussion of indirect effects, which are caused by the action and are later in time or farther removed in distance, but are still reasonably foreseeable. Indirect effects may include growth-inducing effects and other effects related to induced changes in the pattern of land use, population density, or growth rate, and related effects on air and water and other natural systems, including ecosystems. (40 CFR 1502.16[b] and 1508.8[b])

The availability of adequate electric power is one of several potential factors affecting population growth, along with such factors as water supply, the availability of sewage treatment facilities; the availability of developable land; employment opportunities; housing costs and availability; commuting distances; cultural amenities; climate; and local government growth policies contained in general plans and enacted in zoning ordinances.

SCE's Proposed Project would upgrade transmission lines between the Devers Substation in Riverside County and the Vista and San Bernardino Substations in San Bernardino County. The upgraded lines would increase the transfer capacity in the West of Devers corridor to 4,800 MW, allowing additional electrical power to be delivered into load centers, particularly from energy facilities in the desert region east of Devers Substation. The capacity increase would allow additional generation facilities to interconnect to the transmission grid. These facilities are anticipated to be primarily wind and solar renewable energy facilities.

With regard to the Proposed Project, potential growth-inducing impacts could arise in three ways: from direct and indirect employment associated with construction of Proposed Project facilities; by providing additional electrical power supplies; and from the development of generation facilities that would make use of the upgraded transmission line.

The Proposed Project would not contribute *directly* to the creation of permanent jobs or housing in the SCE service area; it is a construction project of limited duration and, as discussed in Section F.1.1 below and in Section D.8 (Socioeconomics and Environmental Justice), would not result in in-migration or long-term job creation.

By delivering additional electric power into the region through the upgraded transmission system, the project would *indirectly* facilitate growth by ensuring the availability of power to serve the growth that is anticipated under adopted city and county General Plans. This is discussed in Section F.1.2 below. Not considering the anticipated growth could result in an insufficient supply of electric power in the future, resulting in delivery curtailments and brown-outs if the combined demand of current and new residents

and businesses outstrips the electric supply. Population growth, including development of housing, commercial and industrial building, and roads to accommodate new residents and businesses would have environmental consequences. These are addressed by the individual cities and counties in the service area as well as regional agencies, which have the authority and responsibility to approve or deny projects and to impose conditions of approval and mitigation to address any significant environmental impacts associated with these projects. Primary responsibility for addressing orderly growth and its impacts rests with the jurisdictions having land use approval authority.

Planned and potential energy generation facilities in eastern Riverside County and Imperial County required access to the electric transmission grid to deliver power to load centers. (These are described in the Introduction to this EIS; see Section A.2.4.3 (Interconnecting Planned Generation Resources.) By increasing the capacity of the transmission system between Devers Substation and Vista and San Bernardino Substations, additional power generation projects could be developed and interconnected to the transmission grid. Development of these projects, in particular renewable energy projects, would result in conversion of extensive areas to this industrial use. This is discussed in Section F.1.3 below

F.1.1 Growth Caused by Direct and Indirect Employment

As indicated in Section B.3.8 (Description of the Proposed Project, Construction Workforce and Equipment) the daily workforce necessary for construction of the Proposed Project is anticipated to be up to approximately 335 to 340 personnel: 300 personnel working on transmission and subtransmission lines, 15 to 20 construction personnel at each substation, and 20 construction personnel on distribution lines. The actual numbers would vary from day to day, depending on the tasks being executed and the number of active construction locations. Removing existing transmission lines and structures and installing new transmission lines and structures while minimizing power outages will require a complex construction schedule. It is expected that multiple locations would be under construction simultaneously and that different activities will be occurring at different locations. To be conservative, the maximum estimated average daily workforce is assumed for the Proposed Project duration. If a substantial number of workers were to relocate permanently, this would have the potential to cause population growth. However, a large local construction workforce is available within reasonable commute distance of the project components. The construction workforce can be drawn from the large population centers in Riverside and San Bernardino Counties, with workers also available from Orange and Los Angeles Counties.

During construction, few if any workers are expected to relocate permanently to the area; as a result, no new demand to local housing is expected attributable to the Proposed Project. Because personnel are not expected to permanently relocate as a result of project implementation, the project would not result in new demand to local public services or facilities that serve the Proposed Project route and region. Following construction, no new personnel are anticipated to be added to the utility's permanent workforce to operate and maintain project facilities once the project is energized. This is because much of the Proposed Project is to replace existing transmission facilities with upgraded transmission facilities.

Section D.8 (Socioeconomics and Environmental Justice) describes the existing labor force within the Proposed Project area. Due the size of the labor force in the region, it is assumed that much of the labor force required for construction would come from within the region, with specialty tradespersons temporarily relocating from elsewhere.

The number of workers in the construction trades locally is indicative of the labor pool that may be available to work on the project. In addition to the labor pool in the immediate vicinity of the project, the larger regional labor pool can be tapped as well, as construction workers typically work throughout the region in which they reside.

At the peak of construction-related activities, the Proposed Project would require an estimated maximum of 335 to 340 workers per day. As shown in Table D.8-1 in Section D.8, San Bernardino and Riverside Counties have a combined construction trades workforce of nearly 134,000 persons. The workforce needed for the project is an exceedingly small portion of the total construction workforce found in San Bernardino and Riverside Counties. The majority of these workers would be expected to commute between their homes and individual work sites or assembly points. A limited number of construction personnel may choose to stay at existing local hotels during construction in lieu of commuting.

Transmission line, fiber optic, and substation construction require a mix of skills. Many skills are available locally; other skills are specialized and specific to the electrical industry. Workers with the required specialized skills often relocate temporarily from elsewhere to work on a project. If workers move to the area from out of state they would require housing. The vacancy rate in rental units in the project vicinity (provided in Table D.8-2) indicates there is a sufficient supply of housing available for transient workers. There is an adequate supply of hotels and other short-term and long-term rental situations within the Proposed Project area to accommodate out-of-town (non-commuting) personnel. As well, some temporarily relocating workers may also bring or acquire trailers in which to live. Therefore, no growth in residential housing or services would occur. Activities associated with construction of the Proposed Project would not increase demand for housing, induce population growth, or be considered growth-inducing.

Operation and maintenance of SCE's transmission line upgrades would require routine and ongoing maintenance. These activities would be similar in nature and extent to those currently occurring on the existing transmission line. Any potential increase in duration, intensity, or frequency would be nominal and would not create long-term employment opportunities. Therefore, operation and maintenance activities would not result in a permanent increase to the local population, increase demand for housing, or be considered growth-inducing.

F.1.2 Growth Related to Provision of Additional Electric Power

As outlined in the Proponent's Environmental Assessment (PEA), SCE's primary objectives of the Proposed Project are the following:

1. Allow SCE to meet its obligation to integrate and fully deliver the output of new generation projects located in the Blythe and Desert Center areas that have requested to interconnect to the electrical transmission grid.
2. Consistent with prudent transmission planning, maximize the use of existing transmission line rights-of-way to the extent practicable.
3. Meet project need while minimizing environmental impacts.
4. Facilitate progress toward achieving California's RPS goals in a timely and cost-effective manner by SCE and other California utilities.
5. Comply with applicable Reliability Standards and Regional Business Practice developed by NERC, WECC, and the CAISO; and design and construct the project in conformance with SCE's approved engineering, design, and construction standards for substation, transmission, subtransmission, and distribution system projects.
6. Construct facilities in a timely and cost-effective manner by minimizing service interruptions to the extent practicable.

The Proposed Project is intended to supply power to the greater Los Angeles basin in response to existing and anticipated regional demand, and is not related to any particular residential or commercial development projects. It is to serve the projected growth in population and energy demand already accounted for in regional and local plans. While construction of the Proposed Project itself would not have direct or indirect growth-inducing impacts, operation of the Proposed Project could facilitate growth indirectly through the additional electric power that would be available.

Section D.8 (Socioeconomics and Environmental Justice) provides a description of the existing populations within the Proposed Project area. The area that would be served by the Proposed Project is experiencing population growth and this growth is expected to occur with or without implementation of the Proposed Project. Local officials have authority over land use decisions in their jurisdictions, determining the type, amount, and location of growth in a region. Providers of basic infrastructure and utilities (e.g., highways and transit services, water and sewer, and gas and electric service) anticipate the demands that will accompany growth and incorporate this information into their planning for new, upgraded, or expanded facilities and services.

The transmission line would be built so that as demand increases, future overloading of transmission facilities would be avoided. By increasing capacity and reducing generation outages, the Proposed Project would increase power system reliability. Increasing reliability and providing additional transmission capacity in anticipation of projected demand growth only *indirectly* affects growth, which is ultimately determined by local land use decisionmakers.

F.1.3 Growth Related to Development of Additional Power Generation Facilities

The determination as to whether SCE's Proposed Project or alternatives to the project would induce growth by altering land use patterns and creating environmental impacts, as noted in NEPA regulations, depends on the extent to which the proposed new transmission line's increased capacity would remove an obstacle to growth in the region.

Growth-Inducing Projects. The proposed transmission line upgrade would provide additional capacity to import electricity from eastern Riverside County into the densely populated Los Angeles basin. Increasing the line capacity between Devers Substation and points west would remove an obstacle to development of new renewable generation projects; some of these projects would not otherwise be able to interconnect to the transmission grid. These are reasonably foreseeable future local renewable generation projects that would be built based on the completion of the Proposed Project or alternatives.

The solar generation projects described in Section B.7, Connected Actions, total 1,574 MW. These are the projects that are considered to be most directly facilitated by the Proposed Project, based on their status in the CAISO interconnection process. The Proposed Project would increase the transfer capacity of the WOD corridor by 3,200 MW, and the "connected" projects would require only 1,574 MW. Therefore, there remains capacity of about 1,626 MW available for other future projects to use. This capacity is considered to be growth-inducing.

Several future renewable energy projects that are tied to the completion of the Proposed Project have been identified; they are presented in Table F-1. Each of the projects in the table is defined as connecting into the Colorado River Substation, but these projects are not yet in the CAISO queue.

Table F-1. Growth-Inducing Projects – Generation or Transmission Made More Likely by Implementation of WOD Upgrade Project

Project Name	MW / Type	Explanation of Growth Inducing Aspects
Blythe Mesa Solar Project, Renewable Resources Group	485 MW Solar PV	This project is facilitated by implementation of WOD Upgrades because it may rely upon the proposed WOD-UP project. The proposed WOD-UP project would improve the likelihood of this project being designated as “deliverable” to the ISO grid, which improves the project’s viability.”
Palo Verde Mesa Solar Project, Renewable Resources Group	486 MW Solar PV	This project is facilitated by implementation of WOD Upgrades because it may rely upon the proposed WOD-UP project. The proposed WOD-UP project would improve the likelihood of this project being designated as “deliverable” to the ISO grid, which improves the project’s viability.”
Desert Quartzite Project (BLM CACA 49497), First Solar	600 MW Solar PV	This project is facilitated by implementation of WOD Upgrades because it may rely upon the proposed WOD-UP project. The proposed WOD-UP project would improve the likelihood of this project being designated as “deliverable” to the ISO grid, which improves the project’s viability.”
Delaney-Colorado River 500 kV Transmission Line	500 kV transmission to Arizona	<p>This transmission project represents growth in transmission capacity east of the Colorado River Substation. This project is assumed to be induced by implementation of WOD-UP because it could not likely be constructed without the capacity provided by WOD-UP.</p> <p>According to SCE Response to Data Request ALT-10: the CAISO decision to approve this transmission line relies on the incremental capacity of the WOD Upgrades to accommodate the additional flow.</p> <p>According to CAISO Response to CEQA Data Request 1: “<i>The Delaney–Colorado River 500kV upgrade is targeted to be in service in 2020 to coincide with the in-service date of the WOD upgrades. If Delaney–Colorado River 500kV is completed before the WOD upgrades, then the economic benefits associated of the project with increased import capability will not accrue until the WOD upgrades are completed. Completion of the Delaney-Colorado River 500 kV project prior to the WOD upgrades would also further aggravate the WOD constraint.</i>”</p>

Additional potential future projects are unknown at this time. For these, information on locations, facility characteristics and size, agency requirements, and the outcome of local land use decisions cannot now be defined. Because of the speculative nature of these potential future projects, they are considered to be beyond the scope of this analysis.

DRECP. In addition, additional transmission capacity may be required as a result of the Draft Desert Renewable Energy Conservation Plan (DRECP) and EIR/EIS was published on September 26, 2014. The development of renewable energy that could occur if the plan is approved could require development of additional transmission lines, even beyond what is envisioned under the Proposed Project. Where feasible, it is likely that these transmission lines would be proposed to be located in or adjacent to existing lines or corridors, which almost certainly would include segments of SCE’s West of Devers right-of-way for generation project in Riverside County. The DRECP Preferred Alternative anticipates the possibility of needing up to two new 500 kV circuits in the WOD corridor. Clearly, providing transmission capacity is an essential link between renewable energy facilities at remote locations and load centers. Easing or removing the transmission constraints west of the Devers Substation (which would happen with implementation of the WOD Project) would increase the likelihood that new generation facilities would be developed. This is a directly foreseeable result of upgrading the transmission capabilities under the Proposed Project. While development of generation projects is not expected to result in large population growth in the vicinity of these facilities, the increased capacity of the transmission grid would lead to “changes in the pattern of land use” and “related effects on air and water and other natural systems, including ecosystems,” identified in NEPA regulations as reasons to address indirect effects. (40 CFR 1508.8(b))

F.1.4 Conclusions Regarding Growth-Inducement

The construction and operation of SCE's Proposed Project would not result in a permanent increase in the local population or demand for housing, or be considered growth inducing from a community growth perspective.

The increased capacity provided by SCE's transmission line upgrade project would remove one obstacle to development of new renewable generation projects in Riverside and Imperial Counties, and therefore would be considered growth-inducing in terms of the likelihood that land uses east and southeast of the Devers Substation would be altered. However, renewable generation projects have generally small permanent employment, so they would not be expected to induce long-term population changes beyond the growth already accounted for in local land use plans.

Construction of the Proposed Project would not result in a significant in-migration of workers or create long-term jobs; therefore, the construction phase of the project is not considered to be growth inducing.

During its operation, the project would facilitate delivery of additional power into the region. This would ensure that the supply of power is reliable and sufficient to meet demand. Providing sufficient reliable power can be construed as growth-inducing, in that people and businesses may be attracted to the region because of this. However, the decision to accommodate growth rests with local officials having jurisdiction over land use plans and decisionmaking. The responsibility and authority to manage growth and its impacts rests with these officials.

By increasing transmission line capacity, the project would allow the development of additional electric power generation facilities. The development and operation of these facilities would not result in substantial population growth, but would result in the conversion of substantial land areas to a new type of land use. The Proposed Project would be growth inducing in that it would allow development of electric power generation projects covering potentially significant amounts of land. While transmission capacity is necessary for development of these projects, it alone is not sufficient. The projects would require approvals from the officials having jurisdiction over the land on which they would be built. The approval process would include environmental review, implementation of conditions of approval and mitigation measures, and consideration of public policy objectives such as increasing the use of renewable energy in lieu of fossil fuels.

F.2 Irreversible and Irretrievable Commitment of Resources

Section 102(2)(c)(ii) of NEPA requires that an EIS include information on any adverse environmental effects that cannot be avoided, should the proposed action be implemented (40 CFR 1502.16). A commitment of a resource is considered *irreversible* when the primary or secondary impacts from its use limit the future options for its use. An *irretrievable* commitment refers to the use or consumption of a resource that is neither renewable nor recoverable for use by future generations. These changes include uses of nonrenewable resources during construction and operation, long-term or permanent access to previously inaccessible areas, and irreversible damages that may result from project-related accidents.

Implementation of the Proposed Project would result in the consumption of energy in the form of fuel needed for vehicles and equipment used during construction. Additional energy would be required for the manufacture of new materials for the project, some of which would not be recyclable at the end of the Proposed Project's lifetime. The energy required for the production of these materials also would result in an irretrievable commitment of natural resources. The anticipated equipment, vehicles, and materials required for construction of the Proposed Project are detailed in Section B.3 (Construction of

Proposed Project). Maintenance and inspection of the Proposed Project would not change appreciably from SCE's existing activities in project area, and thus would not cause a substantial increase in the consumption or use of nonrenewable resources.

Implementation of the Proposed Project would additionally require the permanent loss of approximately 372 acres of vegetation and habitat, which equals 10.5 percent of the total land (3,553 acres) disturbed for construction. Assuming that the mitigation measures for biological resources recommended in this EIS (see Sections D.4 and D.5) would be implemented, project-induced loss of vegetation and habitat would be less than significant.

During the Proposed Project's operational phase, the transport of electrical power generated from non-renewable resources as well as renewable resources would occur. However, a primary purpose of the project is to deliver energy from renewable resources. This ability to deliver renewable energy would be increased with development of the project.

Construction and operation of the Proposed Project would require the use of a limited amount of hazardous materials such as fuel, lubricants, and solvents. Additionally, during project construction and operation preexisting soil or groundwater contamination potentially could be encountered. All hazardous materials would be stored, handled, and used in accordance with the mitigation measures recommended in this EIS and applicable federal, State, and local regulations, including a construction-phase Storm Water Pollution Prevention Plan (SWPPP) and operational-phase Hazardous Materials Business Plan and Storm Water Management Plan. Assuming appropriate implementation of these plans and practices, as well as the mitigation measures recommended in Section D.10 (Public Health and Safety), potential environmental accidents associated with the Proposed Project would be less than significant.

F.3 Adverse Environmental Effects that Cannot be Avoided Should the Proposed Project Be Implemented

The environmental impacts of the Proposed Project are described in the environmental analysis sections in Section D. Impacts that are significant and cannot be reduced to less than significant levels through the application of feasible mitigation measures have been characterized as significant and unmitigable (Class I) impacts. As required by NEPA (40 CFR 1502.16), the five unavoidable adverse impacts resulting from the Proposed Project are summarized below. Complete descriptions of these impacts are presented in Section D.

■ Air Quality

- Impact AQ-1: Construction would generate dust and exhaust emissions of criteria pollutants.

■ Cultural Resources

- Impact CL-2: Construction, operation and maintenance, and restoration could cause an adverse change to unknown buried prehistoric and historical archaeological sites or buried Native American human remains.

■ Noise

- Impact N-1: Construction noise could substantially disturb sensitive receptors or violate local rules, standards, and/or ordinances.

■ Visual Resources

- Impact VR-2: Construction would result in visual contrast due to vegetation removal.
- Impact VR-9: Long-term presence of the project would result in landscape changes that degrade existing visual character or quality.

F.4 Relationship Between Short-Term Uses and Long-Term Productivity of the Environment

NEPA regulations (40 CFR Part 1500 et seq.) require that an EIS discuss issues related to environmental sustainability. The discussion, as it relates to environmental consequences, must be included in the EIS, including consideration of “the relationship between local short-term uses of man’s environment and the maintenance and enhancement of long-term productivity” (42 United States Code [USC] Section 4332[C] [iv] and 40 CFR 1502.16).

This section presents the tradeoffs in the relationship between short-term uses of the environment and maintenance and enhancement of long-term productivity of resources. This is an important consideration when analyzing the effects of a project in terms of whether it would result in short-term environmental effects (adverse or beneficial) to the detriment of achieving long-term objectives or maximizing productivity of affected resources.

Construction-related activities the Proposed Project would create short-term impacts (less than 5 years) when SCE is:

- Establishing temporary staging areas and pulling and splicing sites
- Developing new access and spur roads
- Removing lattice steel towers and wooden poles
- Constructing and erecting new lattice steel towers and tubular steel poles
- Relocating subtransmission lines
- Installing communications lines
- Upgrading substations and existing communications facilities.

The Proposed Project’s construction-related activities are detailed in Section B.3 (Construction of Proposed Project). Where an impact is identified that mitigation that would reduce, or if an impact is not able to be mitigated but does not extend past construction, it was considered a short-term use of the environment. Examples of short-term impacts include construction-period disturbance of soil and vegetation, disruptions to traffic, noise, and fugitive dust. Short-term adverse impacts would occur during Proposed Project construction in these resource areas:

- Agriculture
- Air Quality
- Biological Resources – Vegetation
- Biological Resources – Wildlife
- Cultural Resources
- Geology and Soils
- Hazards and Hazardous Materials
- Land Use and BLM Realty
- Mineral Resources
- Noise
- Paleontological Resources
- Recreation
- Transportation and Traffic
- Utilities and Public Services
- Visual Resources
- Water Resources and Hydrology
- Wildland Fire
- Electrical Interference and Safety

The Impact Summary Tables at the end of the Executive Summary summarize these impacts.

During project construction, local spending by contractors for wages, materials, equipment, lodging, food, entertainment, and other miscellaneous purchases would occur, resulting in a positive short-term economic effect.

Long-term productivity of the area affected by the project would include current uses of the ROW extending beyond 5 years. The Proposed Project would be located in an existing transmission line ROW, with the major change from current conditions being the removal of existing towers and poles and their replacement by other transmission structures and lines. After construction is completed, existing uses would be restored. These uses vary along the length of the ROW and include open space, landscaped recreational areas with paths, agriculture, and vacant land, as well as its use as a transmission corridor. Over the operational lifetime of the Proposed Project, long-term adverse impacts would occur along the ROW. These would be similar in nature to existing impacts and would be associated with the physical presence of the project and ongoing operations and maintenance activities. Ground disturbance during construction could permanently and adversely affect cultural resources. This would be addressed by mitigation measures requiring monitoring and appropriate recordation and curation of any discoveries. The removal of vegetation would create visual contrast, but this would be reduced by subsequent revegetation of disturbed areas as part of project completion. Visual contrast of transmission structures with the environment would result from the presence of new structures; however, this would be reduced by the use of non-reflective, non-specular steel. In addition, many towers of differing sizes and designs would be removed and new towers of a similar design to each other would be installed. The overall number of transmission structures would be reduced. Where feasible, towers would be paired. This would reduce visual disharmony in the ROW. In some locations, the FAA may require installation of aviation warning lighting on towers and marker balls on conductor spans. These would introduce new visual elements into the ROW. The long-term effects of the project would represent relatively minor impacts on the long-term productivity of the land, as compared to its current condition. Existing uses, such as recreation and agriculture, would continue as before.

F.5 Energy Requirements and Conservation Potential of Various Alternatives and Mitigation Measures

NEPA requires a discussion of energy requirements and conservation potential of various alternatives and mitigation measures (40 CFR 1502.16[e]). SCE proposes to upgrade existing electric transmission lines from Devers Substation (in Riverside County) Vista and San Bernardino Substations (in western San Bernardino County), as well as relocate various subtransmission and distribution lines and install communications lines. The project would facilitate the importation of energy from renewable sources in eastern Riverside County into urban load centers. This renewable energy would replace the need for an equal amount of energy produced by non-renewable resources such as natural gas, oil, and coal.

As stated above in Section F.2 (Irreversible and Irretrievable Commitment of Resources) construction activity associated with the Proposed Project or any of the alternatives would require the consumption of fuel for construction vehicles, construction equipment, and helicopter use. Additionally, construction would require the manufacture and delivery of new materials, which would require energy use. Based on their composition, some of the structures and conductors to be removed would be recyclable. As well, at the end of the Proposed Project's lifetime, materials installed as part of the project would be recyclable. Recycling would reduce the energy needs of materials production, as compared to manufacturing materials from new raw materials such as ore or petroleum. Maintenance and operations and inspection of the Proposed Project would not change appreciably from SCE's existing activities in project area, and thus would not cause a substantial increase in the consumption or use of nonrenewable resources.

Addressing some aspects of air quality impacts and traffic congestion also reduces energy consumption. SCE will be required to prepare a Construction Management Plan (Mitigation Measure T-1a), which will include methods of reducing crew-related traffic, such as carpooling from assembly points. The California Air Resources Board (CARB) limits idling time of construction vehicles, reducing emissions and fuel use. Such measures would be increase the energy efficiency of the project.

No increases in inefficiencies or unnecessary energy consumption are expected to occur as a direct or indirect consequence of the project.

F.6 References

SCE (Southern California Edison). 2013. Proponent's Environmental Assessment for the West of Devers Upgrade Project. Application A.13-10-020. October 25, 2013.